

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>DATE FILED:</b>
<b>v.</b>	<b>:</b>	<b>CRIMINAL NO. 08-</b>
<b>MATTHEW MONTGOMERY</b>	<b>:</b>	<b>VIOLATION:</b>
		<b>18 U.S.C. § 1361 (willfully injuring and</b>
		<b>acts of depredation against property</b>
	<b>:</b>	<b>under contract to federal government</b>
		<b>causing damage in excess of \$1,000 – 1</b>
		<b>count)</b>

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times relevant to this information:

1. The United States Army, through the United States Aviation and Missile Command, Redstone Arsenal, Huntsville, Alabama had issued contracts to The Boeing Company, through its Rotorcraft Systems Division, Boeing Integrated Defense Systems Unit (“Boeing”), for the manufacture and delivery of combat-ready CH-47F “Chinook” helicopters, including Aircraft 8718. Boeing, one of the largest United States’ aerospace and military contractors, has its headquarters in Chicago, Illinois.
2. Under the contract between the United States Army and Boeing, the firm, fixed-price for Aircraft 8718 was \$23.8 million for its manufacture and delivery on or before September 1, 2008.
3. The primary site for Boeing’s manufacture of these combat-ready CH-47F Chinook helicopters, including Aircraft 8718, was the Rotorcraft Systems production line facility in Ridley Township, Pennsylvania. It took approximately one year to complete manufacture of a

CH 47F Chinook helicopter at the Boeing Ridley Township production line facility.

4. The CH-47F Chinook helicopter, including Aircraft 8718, was a medium-to-large-capacity, twin engine, dual-rotor aircraft with a large rear loading ramp that carried up to 21,000 pounds and a mission radius of approximately 500 miles. It was used, among other things, for combat re-supply and troop transportation in areas in which the Army was actively engaged. The helicopters used advanced avionics, which are dependent on the aircraft's sophisticated electrical systems.

5. As part of the manufacturing process, individual electrical wires in the CH-47F Chinook helicopter were grouped together into bundles as much as two inches in diameter, and the bundles were then secured to the frame of the aircraft. Under its contract with the Army, defective or broken wires could not be repaired, but had to be replaced in their entirety.

6. Defendant MATTHEW MONTGOMERY was a Boeing Aircraft Mechanic/Sheet Metal Assembler who had worked at the Rotorcraft Systems production line facility in Ridley Township since on or about September 8, 2006. In or about May 2008, defendant MONTGOMERY's work assignment included aircraft assembly on Aircraft 8718 near the completion of the manufacturing process.

7. On or about May 10, 2008, in Ridley Township, in the Eastern District of Pennsylvania, defendant

**MATTHEW MONTGOMERY**

willfully injured and committed acts of depredation against property being manufactured and constructed for the United States and its departments, causing injury and damage in excess of

\$1,000, and attempted to do so, when at the end of his shift defendant MONTGOMERY used a Boeing Company-issued tool to sever wires in a two-inch bundle of over 150 electrical wires running between the cockpit and the body of Aircraft 8718, a CH-47F Chinook helicopter then under manufacture for the United States Department of the Army, disabling the electrical function of Aircraft 8718, including that affecting its avionics and flight control systems, and causing Boeing to have to remove, replace, reinstall and retest the entire bundle of electrical wires at a cost in excess of \$100,000.

In violation of Title 18, United States Code, Section 1361.

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**LAURIE MAGID**  
**ACTING UNITED STATES ATTORNEY**